

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

NESSA RISLEY, JAMES FREELAND, ROBERT SCOTT, ANNIE VENESKY, ANDREW CARDIS, and DEAN MEYERS, Individually and on Behalf of All Others Similarly Situated,

Plaintiffs,

V.

UNIVERSAL NAVIGATION INC. d/b/a UNISWAP LABS, UNISWAP FOUNDATION, HAYDEN Z. ADAMS, PARADIGM OPERATIONS LP, AH CAPITAL MANAGEMENT, L.L.C. d/b/a ANDREESSEN HOROWITZ, and UNION SQUARE VENTURES, LLC,

## Defendants.

Case No. 22 Civ. 2780 (KPF)

**NOTICE OF MOTION TO DISMISS OF  
UNIVERSAL NAVIGATION INC. (d/b/a UNISWAP LABS) AND HAYDEN Z. ADAMS**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Declaration of Brandon Fetzer, and the exhibits attached thereto, defendants Universal Navigation Inc. d/b/a/ Uniswap Labs and Hayden Z. Adams hereby move, pursuant to Federal Rule of Civil Procedure 12(b)(6), to dismiss the Amended Complaint with prejudice.

Dated: New York, New York DEBEVOISE & PLIMPTON LLP  
December 21, 2022

/s/ Elliot Greenfield  
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